



Via Electronic Filing

October 3, 2016

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington DC 20554

RE: WC Docket No. 11-42 - Lifeline Reform and Modernization
WC Docket No. 09-197 - Telecommunications Carriers Eligible for Universal Service Support
WC Docket No. 10-90- Connect America Fund

Dear Secretary Dortch:

On behalf of the low-income, disabled and older consumers we represent at the Alliance for Retired Americans,¹ Community Action Partnership², and the National Association of American Veterans,³ we are writing to express our concerns about the Commission's intent to reduce the de-enrollment for non-usage rule from 60 to 30 days for Lifeline- supported service. Reducing the non-usage period from 60 to 30 days for Lifeline users would disrupt service and cause un-needed hardship for many thousands of low-income Lifeline-eligible households, including many in the communities we serve. We have learned that TracFone Wireless (along with other Lifeline providers) has a filed a motion for a stay or deferral of the effective date of that rule change and we support TracFone's request.

We have reviewed these filings, and concur with comments that the most common reasons for non-usage include temporary absence from the country, illness or incapacity.⁴ In fact, as organizations that work with many households who use Lifeline service, we have seen that many times these users – who include veterans, grandparents, and people with disabilities – may temporarily stop usage because they are in respite care, recuperating in a hospital, or have moved in with other family members temporarily for health or other personal reasons. It is because of their already challenging lives that they are not using the phones, as simple as that. But having to re-enroll is not always simple.

¹ The Alliance for Retired Americans is a national grass roots, 4.2 million member organization that advocates for the health and well-being of retirees and older Americans. (retiredamericans.org)

² The Community Action Partnership is the nonprofit, national membership organizations representing the interests of the 1,100 Community Action Agencies (CAAs) across the country that annually help 17 million low-income Americans achieve economic security. (communityactionpartnership.com)

³ The National Association of American Veterans, Inc. was established in 2005 to assist wounded warriors, military caregivers, disabled veterans and their families, helping them access benefits, improving communications and coordination for veterans and collaborating among health agencies, medical professional, organizations, educational organization and the general public. (naavets.org)

⁴ See Comments of TracFone Wireless (filed September 16, 2016), WC Docket 11-42, et al. Link [here](#).

The 60 to 30 days reduction would add another burden to the many already being borne by low-income consumers who are Lifeline-eligible and intend to remain in the program. In its motion, TracFone noted that “approximately twenty-five percent of persons de-enrolled following 60 days” re-enroll the following month.⁵ Sprint corroborated, saying that in a “30 day period, 38 percent resume their usage within the next 15 days, while 66 percent resume usage within the next 60 days.”⁶ These households benefit and want to stay in the program. By terminating their Lifeline service after 30 days’ non-usage, the Commission will be making it more difficult for those persons to continue to receive the Lifeline-supported service which is so essential to them.

Many low-income Americans are going through life transitions when they enroll in Lifeline. They use the service to find and keep a job, for emergencies, or to keep in touch with families, health providers and educators. These are modest goals; 60 days is a modest amount of time; 30 days is too short. We urge the FCC to reconsider the move to reduce the de-enrollment for non-usage period for Lifeline phone users from 60 days to 30 days, and to not go through with the rule change on December 1, 2016. At the very least, we respectfully ask the Commission to defer the rule change until it has had an opportunity to address the objections to that change in the pending petitions for reconsideration.

Respectfully submitted,

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CC: FCC Commissioners and Wireline staff

⁵ See Comments of TracFone Wireless (Filed September 8), WC Docket 11-42, et al. Link [here](#).

⁶ See Comments of Joint Lifeline ETC Petitioners (filed September 15, 2016), WC Docket 11-42, et al. Link [here](#).